

REMARKS

This application has been carefully reviewed in view of the above-referenced Office Action, and reconsideration is requested in view of the following remarks.

In response to the Office Action mailed on August 24, 2006, Applicant wishes to enter the following remarks for the Examiner's consideration. Claims 1-24 are pending in the application.

Claim Objections

Claims 14-17 have been amended to provide the correct pendency. The amendments go to correct an informality and thus are not considered to add new matter or raise new issues.

Claim Rejections – 35 USC 102

Claims 1, 3-7 and 22-24 are rejected under 35 USC 102(b) as being anticipated by Knapp, Jr. et al. (U.S. Patent No. 4,616,207), hereinafter the '207 reference. Applicant respectfully traverses this rejection of the claims.

As a preliminary matter, ***Applicant respectfully requests that the finality of the office action be withdrawn.*** Applicant is unsure, as will be discussed below, of the basis of the rejection used by the examiner in the office action of August 24, 2006. As this is the first office action citing the '207 reference, Applicant respectfully submits that the causes of fairness and a meaningful advancement of prosecution are best served by having an office action in which the basis of rejection is stated with particularity so as to allow Applicant the opportunity to prepare a cogent response.

Referring to the basis of rejection of claims 1, 3, 5, and 22-23, Applicant respectfully submits that it is not clear from the office action upon what basis of rejection these claims rests for the foregoing reasons. The examiner states that in '207 Fig. 6-10 a bracket 63 having a bulkhead retaining portion is shown. An item 63 only occurs in '207 Figs. 6, 7. so it will be assumed those Figures are what the examiner meant to refer to. Item 63 is a "top supporting wall of the fuse base"; see '207 column 5 lines 30-31. It is nowhere referred to as a bracket.

The examiner states that “a retain portion as shown at right corner of Figs 6 and 8”. It is not clear what the examiner means when referring to the “right corner of Figs 6 and 8.” There are, in fact, two right corners in each of these two figures. On the right side of Fig. 6, several items are shown, including LED 65, side wall 67, loop 76, connector 70, opening 64, electrically conductive material 74, and 61, which does not appear to be discussed or named in the ‘207 reference. Additionally, the right side of Fig. 8 has fuse base 96 and output connector 110 (note that these are all terms used in the ‘207 reference).

If one were to assume, though there is nothing to support such assumption from the information given in the August 24, 2006 office action, that the examiner means to refer to item 67 of Fig. 6, reference to this side wall fails to teach the recitation of a bulkhead retaining portion as cited in the pending claims. Item 67 is defined as “a side wall of the base of the fuse holder”; please see ‘207 column 5 line 57. Items 63 and 67 are not portions of the same member, or bracket, as they must be held together by item 74, which ‘207 defines as a “current carrying interconnecting member around the bob-bin/coil/core arrangement”; please refer to column 5 lines 47-49 of ‘207. Item 74 therefore is required to attach item 63 to item 67. **The “bracket” item 63 of ‘207 therefore does not have a bulkhead retaining portion as recited by claim 1 element 1.** But again, applicant cannot know that this is the basis of the examiner’s assertion of a bulkhead retaining portion. Applicant respectfully requests that a new, non-final office action stating the basis of rejection with more particularity be forthcoming at the examiner’s earliest convenience.

The examiner next states that in ‘207 a protective device (12, Fig 10) is shown. This is true. The protective device however achieves electrical contact via electrically conductive item 74 to connector 70; see ‘207 column 5 lines 36-38. The protective device therefore is electrically connected to item 67, which is defined as a “side wall”, see ‘207 column 5 line 57. The protective device is also coupled to “bracket” item 63 by mechanical contact between items 68, 74, and 63, and tightened by a screw. The claimed invention does not teach electrical contact

between the protective device and the bracket or the bulkhead. The examiner further states that “a retaining element/nut (Fig 6-8) operable to couple the protective device to the bracket”. Nowhere in Figs 6-8 is a nut shown. Nowhere is a single retaining element shown to attach the protective device to the bracket. **‘207 does not teach a single retaining element to couple the protective device to the bracket, as recited by claim 1 element 3 and claim 1 element 4.** Again, Applicant must respectfully request a new, non-final office action in which the examiner withdraws the finality of the rejection of the claims and states with particularity the basis upon which rejection of the claims is being made.

It should further be noted that if ‘207 item 67 is to be considered a bulkhead by the examiner, that an additional member, item 74, is required to couple the bracket to the bulkhead. The present claims teach that an additional member is not required.

Claim 3

With regard to claim 3, this claim depends from claim 1 and it is believed that the rejection of claim 1 over the cited reference has been overcome. In addition, applicant can find no mention of a tab portion of the “bracket” item 63 in ‘207.

Claim 4

With regard to claim 4, this claim depends from claim 1 and it is believed that the rejection of claim 1 over the cited reference has been overcome. Additionally, in ‘207 it is clear that the protective device mounting portion of the bracket is in contact with, and is in fact the same physical piece, as the bulkhead mounting portion of the bracket, being that area beneath the left-hand screw in Fig 6 of ‘207.

Moreover, with regard to the examiner’s paragraph at the bottom of office action page 2, it is not clear to what the examiner refers. It is clear that fuse clip 90

is in contact with upper surface 94 (fuse base 96) through current carrying member 88 and the left-hand screw.

Claim 5

Claim 5 depends from claim 1, to which rejections are believed to have been overcome. Additionally, no item number has been assigned to the left-hand screw of '207 Fig 6, and this is the only item in '207 Applicant thinks could be considered the protective device retaining portion taught by the present invention. But in '207, not only is it not numbered it is not discussed as the retaining portion of the protective device.

Claim 6

In addition to Claim 6 depending from claim 1, discussed above, the '207 reference does not teach first and second tab portions of the "bracket" item 63. Fig 10 does not teach a plurality of tab portions of the bracket; the bracket is not really visible in Fig 10. Again, this basis of rejection is unclear and a non-final office action clarifying this point is respectfully requested.

Claim 7

Applicant respectfully submits that Fig 10 of the '207 reference does not teach a plurality of tab portions of the bracket; again, the bracket is not really visible in Fig 10.

Claim 22

Claim 22 element 1 recites a bracket having a bulkhead retaining device. As discussed previously, '207 does not teach this; it teaches the use of an interim mechanical member, item 74, to attach bracket item 63 to what the examiner perceives to be a bulkhead, item 67. The additional in-between member is not required by the present invention and is not recited in the claims.

Claim 23

Claim 23 depends from claim 22, which is believed to be patentably distinct over the present invention.

Claim 24

Claim 24 depends from claim 23 and claim 1, and objections to claims 23 and claim 1 are believed to have been overcome. Additionally, '207 does not teach tab portions of the bracket, nor does it teach means for coupling first and second protective retaining devices to retain first and second protective devices to the first and second tab portions, as cited by claim 24. As previously discussed, Fig 10 does not teach a plurality of tab portions of the bracket; the bracket is not really visible in Fig 10.

In light of the foregoing amendment and remarks, Applicant respectfully submits that the '207 reference does not teach, suggest, disclose or otherwise anticipate the recitations of these claims. Applicant thus respectfully requests that this basis of rejection of the claims be withdrawn and that a new, more descriptive office action be mailed at the Examiner's earliest convenience.

Claim Rejections – 35 USC 103

Claims 8-21 are rejected under 35 USC 103(a) as being unpatentable over Currier et al. (U.S. Patent No. 6,441,304), hereinafter the '304 reference, in view of Knapp, Jr. et al, the '207 reference. Applicant respectfully traverses this rejection of the claims.

Claim 8

The examiner states that '304 teaches a power connector assembly Fig 1, comprising a bracket assembly 12, and power connector 14, and a bracket power connector fastening element Fig 1 operable to couple the power connector to a

bulkhead (12e, 12c, 12d) and the bulkhead to the racket assembly. However, please note that the recitations of claim 8 element 3 are not met, i.e. there is no element shown in '304 which will couple the power connector to a bulkhead and the bulkhead to the bracket assembly. In fact it takes a plurality of elements to do this in '304, refer to the discussion of '304 at column 3 lines 3-46. That there is no retaining element between bulkhead and bracket is illustrated at '304 column 2 lines 55-59, where it is stated that the bulkhead (12) may be preassembled or molded integrally with the bracket (10). This shows that no retaining element is required to connect the bulkhead to the bracket, which directly contradicts claim 8 element 3 which recites not only a fastening (retaining) element to connect the bulkhead to the bracket, but that it also connects the power connector to the bulkhead. This fastening element does not exist in '304.

Further, claim 8 element 4 recites that the bracket further comprises a protective device mounting portion to which the protective device is coupled by a protective device retaining element. The examiner states that the bracket of the '304 reference is 10. However, were a protective device to be placed there, there would be no electrical connectivity with the power connector assembly '304 14. This is specifically stated at '304 column 3 line 48- column 4 line 7, where it is stated that bracket 10 is not required at all for correct operation of '304. The power connector connects directly to input and output wiring, which come from either a clearance hole in bracket 10 or come from a raceway. and in neither of these possibilities does bracket 10 play any sort of electrical connectivity role. Since there is no electrical access taught for bracket 10, it would not have been possible to place an electrical protective device there. The teachings of '207 therefore do not apply with regard to incorporating a protective device using '304 as a basis.

Claim 14

Since a '304 protective device mounting portion which is a tab portion of bracket assembly 10 is not taught or envisioned, with or without '207, as discussed previously, applicant respectfully submits that this basis of rejection is overcome.

Claim 15

Since a protective device mounting portion is not taught by '304, and indeed is not possible in conjunction with '207, as previously discussed, applicant respectfully submits that this basis of rejection is overcome.

Claim 16

There is no protective device mounting portion of the bracket assembly taught by '304 or '304 in view of '207, as discussed previously, therefore the examiners objection is without merit.

Claim 17

Since no protective device is possible considering '304 or '304 in view of '207, there are no first and second protective devices or their first and second tab portions as recited by claim 17. Applicant respectfully submits that this basis of rejection is overcome.

Claim 9

The examiner uses '304 item 10 as the "bracket" and '304 item 12 as the "bulkhead", see previous discussions. Nowhere in '304 is it taught that bracket 10 may be inserted through a receiving portion of bulkhead 12. In fact, '304 Fig 1 clearly shows bracket 10 to be larger than bulkhead 12, and nowhere is bulkhead 12 said to have holes or clearances of any sort to receive the pass-through of bracket 10. Unfortunately, applicant believes that this interpretation occurs due to a distortion of the teachings of the '304 reference. Applicant has continued to use the

examiner's interpretations of "bracket 10" and "bulkhead 12" only in order to answer his objections.

Claim 18

There are no third and fourth cables of the plurality of cables coupled to the protective device element, protective device mounting portion, means for coupling the protective device, protective device mounting portion being a tab portion of the bracket assembly, or a protective device mounting portion not in contact with the bulkhead mounting portion of the bracket assembly, all as recited by claim 18, that is taught by '304 or a combination of '304 and '207. Refer to previous discussions.

Claim 10

Nowhere does '304 or the combination of '304 and '207 teach a plurality of cables coupled to the protective device as recited by claim 10. The examiner should please refer to previous discussions regarding protective devices.

Claim 11

Nowhere does '304 or the combination of '304 and '207 teach a protective device, as recited by claim 11. Please refer to previous discussions on this point. Applicant must therefore assert that claim 11 would therefore not have been obvious.

Claim 12

Claim 12 depends from Claim 11, which recites protective devices. Protective devices are not taught by '304 or the combination of '304 and '207. Refer to previous discussions. Claim 12 would therefore not have been obvious.

Claim 19

Claim 19 element 1 recites coupling a protective device to a bracket, and a bracket assembly having the protective device integral thereto. As discussed

previously, '304 does not physically allow for the inclusion of a protective device in bracket 10, and does not allow for any electrical connection within bracket 10 for such a device or any other device. In fact, as discussed previously, bracket 10 is not even required to implement '304. Therefore the combination of '304 and '207 do not allow placement or wiring to protective devices located on bracket 10. Please refer to previous discussions.

Claim 20

'304 does not teach coupling a bracket assembly and power connector to the bulkhead utilizing bulkhead retaining means. Bracket 10 and power connector assembly 14 have no common connection means to connect to bulkhead 12. In fact, bracket 10 is not even a required item as previously discussed. It therefore would not have been obvious to couple bracket assembly 10 and power connector assembly 14 to bulkhead 12 utilizing some undescribed bulkhead retaining device.

Claim 21

Claim 21 depends from Claim 20, and it would not have been obvious to couple bracket 10 to a first surface of bulkhead 12, and to couple power connector assembly 14 to a second surface of bulkhead 12 since no common retaining means is described by '304 or the combination of '304 and '207 for coupling bracket 10 and power connector 14 to bulkhead 12.....much less for coupling them to first and second surfaces of bulkhead 12.

In light of the foregoing amendment and remarks, Applicant respectfully submits that the combination of the Currier '304 reference and the Knapp '207 reference fails to render obvious or otherwise make unpatentable the recitations of the claims. Applicant thus respectfully requests that this basis of rejection of the claims be withdrawn and that a Notice of Allowance for these claims be mailed at the Examiner's earliest convenience.

Although additional arguments could be made for the patentability of each of the claims, such arguments are believed unnecessary in view of the above discussion. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

All claims are believed to be in allowable condition and such allowance is respectfully requested at the Examiner's earliest convenience. The Examiner is cordially invited to contact the undersigned if there are any questions about this application or response.

Respectfully submitted,

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